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By Email

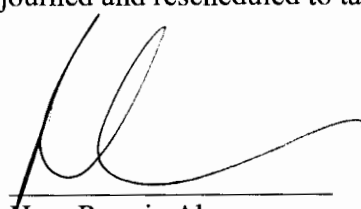
Honorable Ronnie Abrams
United States District Court Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. John Galanis,
16 CR 371 (RA)

Application Granted.

Mr. Galanis' sentencing, currently scheduled to take place on December 7, 2018, is hereby adjourned and rescheduled to take place on January 16, at 4 p.m.

SO ORDERED.


Hon. Ronnie Abrams
November 21, 2018

Your Honor,

I have waited until the last moment to make this application because I had truly hoped it would be unnecessary but unfortunately due to circumstances beyond my control it has become necessary. It is the defense's position that one of the more important issues for this Court to consider when arriving at a just sentence for John Galanis is his current medical condition. As the Court is well aware Mr. Galanis has many serious medical issues that he is currently living with some of which have been deteriorating over the past few months. Mr. Galanis with the help of his friend for many decades Mr. Paul Grand has been able to attain a medical doctor to review his current medical conditions and write a report for the Court to consider at the time of sentencing. For weeks now Mr. Galanis has been petitioning the BOP to give him the results of the MRI¹ that was given to him a month ago and also the results of his latest blood tests.² It is only with this information that a doctor can write a credible report for the Court. The problem is that the BOP has just not complied with Mr. Galanis' request in a timely fashion and therefore the doctor has not been able to write a meaningful report for the Court to consider.

Therefore, I am forced to most respectfully request that the Court adjourn Mr. Galanis' sentencing hearing (currently scheduled for December 7th) until the middle of January to a

¹ The emergency room doctors originally ordered this MRI after the transportation accident Mr. Galanis was involved in during the trial. To refresh the Court's recollection the US Marshals forgot to tether Mr. Galanis' wheelchair to the floor and during his trip back to the MDC after Court his wheel chair was flipped over as the van accelerated. This accident is also referenced in §121 of the Pre-Sentence Report. It took the BOP months to actually conduct this MRI.

² Earlier in the fall Mr. Galanis' PSA levels were 33% higher than the already high levels that were present back in the spring.

Hon. Ronnie Abrams
November 20, 2018
Page 2 of 2

date that is convenient for the Court so that the test results can be obtained from the BOP, reviewed by the doctor and a meaningful report can be issued to the Court. I am sure the Court will agree that a true picture of Mr. Galanis' health issues is an important factor for the Court to consider in arriving at a just sentence in this matter. I apologize for the delay caused by this request,

Thank you very much for your consideration of this matter.

Most Respectfully,


David Touger, Esq.